

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO.,  
GEICO INDEMNITY CO., GEICO GENERAL  
INSURANCE COMPANY and GEICO  
CASUALTY CO.,

Plaintiffs,

-against-

**Docket No.: 1:20-cv-01214-RRM-LB**

NORTHERN MEDICAL CARE, P.C., et al.,

Defendants.

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**NOTICE OF MOTION TO STAY AND ENJOIN**  
**UNDERLYING COLLECTION PROCEEDINGS**

**PLEASE TAKE NOTICE** that the Plaintiffs, Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co., (collectively, “GEICO”) respectfully move this Court for an Order granting Plaintiffs’ Motion to Stay and Enjoin Underlying Collection Proceedings, pending disposition of GEICO’s declaratory judgment claim in this action, together with such other and further relief as the Court deems just.

**PLEASE TAKE FURTHER NOTICE** that any papers in opposition to this motion shall be served in accordance with Local Civil Rule 6.1(b).

Dated: Uniondale, New York  
February 10, 2021

Respectfully submitted,

RIVKIN RADLER LLP



By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that the attached Notice of Motion, Plaintiffs' accompanying Memorandum of Law, and the accompanying Declaration of Steven T. Henesy have been served on all Parties via their counsel via ECF.

Dated: February 10, 2021



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Steven T. Henesy